

March 1, 2010

Marlene H. Dortch Office of the Secretary ATTN: CPNI Compliance Report Federal Communications Commission 445 12th Street, Suite TW0A325 Washington D.C. 20554

RE: EB Docket No. 06-36

CPNI Compliance Certification

Sunflower Broadband

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate for Sunflower Broadband. Please note that this report is confidential and is filed under seal. A copy will be provided to Best Copy and Printing, Inc. 445 12th Street, Suite CY-B402, Washington D.C. 20554 via email.

Sincerely,

Debra R. Schmidt

Director

Sunflower Broadband

Enclosures:

Officer's CPNI Compliance Certificate

Attachment to Statement Regarding CPNI Operating Procedures

cc: Best Copy and Printing, Inc.

445 12th Street, Suite CY-B402

Washington D.C. 20554

Email: FCC@BCPIWEB.COM

OFFICER'S CPNI COMPLIANCE CERTIFICATE

Annual 47 C.F.R. Section 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 1, 2010

Name of company covered by this certification: Sunflower Broadband

Form 499 Filer ID: 0002337509

Name of signatory: Dan Simons

Title of Signatory: President of Electronics Division

I, Dan Simons, certify that I am President of Electronics Division of Sunflower Broadband, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to insure compliance with the Commission's CPNI rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations ("Customer Proprietary Network Information").

Attached to this certification is an accompanying statement explaining how the CPNI operating procedures of Sunflower Broadband, ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system or at the Commission against data brokers) against data brokers in the past year (2009).

The company represents and warrants that the above certification is consistent with 47 C.F.R. Section 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

Signed:

Date:

3-01-10

ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE

Statement Regarding CPNI Operating Procedures

Sunflower Broadband's written CPNI Operating Procedures ensure that Sunflower Broadband will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Sunflower Broadband's CPNI Operating Procedures are:

- A requirement that Sunflower Broadband have at all times a CPNI Compliance Officer to supervise the implementation of Sunflower Broadband's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

Actions Taken Against Data Brokers

Sunflower Broadband was not required to take action against any data brokers in 2009.

Summary of Customer Complaints Based on Unauthorized Release of CPNI

Sunflower Broadband received no customer complaints based on unauthorized release of CPNI in 2009.